

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<div style="text-align: center;">LA UNIÓN DEL PUEBLO ENTERO, et al., <i>Plaintiffs,</i></div> <div style="text-align: center;">v.</div> <div style="text-align: center;">GREGORY W. ABBOTT, et al., <i>Defendants.</i></div>	5:21-cv-0844-XR
<div style="text-align: center;">OCA-GREATER HOUSTON, et al., <i>Plaintiffs,</i></div> <div style="text-align: center;">v.</div> <div style="text-align: center;">TEXAS SECRETARY OF STATE JOHN SCOTT, et al., <i>Defendants.</i></div>	1:21-cv-0780-XR
<div style="text-align: center;">HOUSTON AREA URBAN LEAGUE, et al., <i>Plaintiffs,</i></div> <div style="text-align: center;">v.</div> <div style="text-align: center;">GREGORY WAYNE ABBOTT, et al., <i>Defendants.</i></div>	5:21-cv-0848-XR

**PLAINTIFFS’ UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS FOR  
THEIR OPPOSITION TO DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

Plaintiffs La Unión Del Pueblo Entero, et. al., (“LUPE Plaintiffs”), Houston Area Urban League, et. al., (“HAUL Plaintiffs”), and OCA–Greater Houston Chapter, et al. (“OCA Plaintiffs”) (collectively, “Plaintiffs”) respectfully request an extension of the thirty-page limit set by the Honorable Xavier Rodriguez for their opposition to State Defendants’ Motion for Summary Judgment on Plaintiffs’ ADA and Rehabilitation Act Claims and to those portions of Defendant Kim Ogg’s Motion for Summary Judgment that address claims under the Americans with Disabilities Act and section 504 of the Rehabilitation Act. Plaintiffs seek permission to file a

response brief that does not exceed 50 pages – exclusive of exhibits. The Defendants, through counsel, have indicated that they do not oppose this motion.

Plaintiffs request leave to file additional pages due to the complexity of issues involved in this case and the need to summarize voluminous evidence supporting Plaintiffs’ claims. Properly responding to the arguments made by Defendants will require more than the thirty pages permitted by the Honorable Xavier Rodriguez without leave of court.

In addition, Defendants Gregory W. Abbott, in his official capacity as Governor of Texas, Jane Nelson, in her official capacity as Secretary of State, Warren K. Paxton, in his official capacity as Attorney General of Texas, and the State of Texas (collectively, “State Defendants”), and Defendant Kim Ogg, in her official capacity as Harris County District Attorney (“District Attorney Defendant”), filed separate motions for summary judgment. Both State Defendants’ and District Attorney Defendant’s motions exceed the standard thirty-page motion permitted by the Honorable Xavier Rodriguez without leave of court. State Defendants’ motion contains twenty-three (23) pages of substantive briefing, and District Attorney Defendant’s motion contains thirty (30) pages of substantive briefing. Plaintiffs are now tasked with responding to fifty-two pages of arguments.

For the sake of efficiency for this court, Plaintiffs aim to respond to all of Defendants’ claims under the Americans with Disabilities Act (“ADA”) and Rehabilitation Act at once. In order to effectively oppose State Defendants’ and District Attorney Ogg’s claims, Plaintiffs require these additional pages to present necessary evidence.

This request is made in good faith and not for the purpose of delay, and solely to permit Plaintiffs to efficiently present the relevant evidence and address each argument within the motions for summary judgment. Plaintiffs do not intend to burden the Court with duplicative, cumulative, or unnecessary information.

Based on the foregoing, Plaintiffs respectfully request that their unopposed motion for leave to exceed page limits be granted.

Date: June 16, 2023

Respectfully submitted,

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